

Food and Drug Administration Washington, DC 20204

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Antonio C. Martinez, II., Esq. 8707 Brittany Drive P.O. Box 2060 Wayne, New Jersey 07474-2069

Dear Mr. Martinez:

This is in response to your letter of November 13, 1998, on behalf of American Specialty Health & Wellness of San Diego, California, to the Food and Drug Administration (FDA) pursuant to 21 U.S.C. 343(r)(6) (section 403(r)(6) of the Federal Food, Drug, and Cosmetic Act (the Act)). Your submission states that American Specialty Health & Wellness is making the following statements, among others, for the products:

Astragulus Extract

"...promote healing..."

Vitamin E Plus
Vitamin C Complex
Vitamin C Ester C
"...healing of wounds"

Daily Multi-Mineral
Daily Multiple Vitamin + Mineral

"...for healing...and resistance to illness"

21 U.S.C. 343(r)(6) makes clear that a statement included in labeling under the authority of that section may not claim to diagnose, mitigate, treat, cure, or prevent a specific disease or class of diseases. The statements that you are making for these products suggest that they are intended to treat, prevent, mitigate, or cure diseases, namely wound healing and general illnesses. These claims do not meet the requirements of 21 U.S.C. 343(r)(6). These claims suggest that these products are intended for use as drugs within the meaning of 21 U.S.C. 321(g)(1)(B), and that they are subject to regulation under the drug provisions of the Act. If you intend to make claims of this nature, you should contact FDA's Center for Drug Evaluation and Research (CDER), Office of Compliance, HFD-310, 7520 Standish Place, Rockville, Maryland 20855.

975-0/63

LET 235

Page 2 - Antonio C. Martinez, II, Esq.

Please contact us if we may be of further assistance.

Sincerely,

Lynn A. Larsen, Ph.D.
Director
Division of Programs and Enforcement Policy
Office of Special Nutritionals
Center for Food Safety
and Applied Nutrition

Copy: Dr. Doug Metz

American Specialty Health & Wellness

8989 Rio San Diego Drive

Suite 250

San Diego, CA 92108

Copies:

FDA, Center for Drug Evaluation and Research, Office of Compliance, HFD-300 FDA, Office of the Associate Commissioner for Regulatory Affairs, Office of Enforcement, HFC-200

FDA, Los Angeles District Office, Office of Compliance, HFR-PA240

cc:

HFA-224 (w/incoming)

HFA-305 (docket 97S-0163)

HFS-22 (CCO)

HFS-456 (file)

HFS-450 (r/f, file)

HFD-310 (BWilliams)

HFD-314 (Aronson)

HFS-600 (Reynolds)

HFS-605 (Bowers)

GCF-1 (Nickerson, Dorsey)

f/t:HFS-456:rjm:11/17/98:docname:62292.adv:disc33

ANTONIO C. MARTINEZ, II. P.C.

Attorney at Law
Government and Public Affairs Counsel
8707 Brittany Drive
P.O. Box 2069

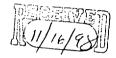
WAYNE, NJ 07474-2069 Tel 973 305 1235 FAX, 973 305 3983 6229

NEW JERSEY, NEW YORK, DISTRICT OF COLUMBIA BARS

EMAIL: TONYMARTINEZ@COMPUSERVE.COM

November 13, 1998

Office of Special Nutritionals U.S. Food & Drug Administration HFS-450 CFSAN 200 C St. NW Washington DC 20204



By Federal Express Courier Service, Tracking # 7901 6502 4108

Re: Statements of Nutritional Support Filings, American Specialty Health & Wellness, San Diego, CA

Dear Sir/Madam:

As counsel for American Specialty Health & Wellness (ASHW), enclosed please find an original and two copies of Statement of Nutritional for ninety three dietary supplement products distributed by ASHW. Should you have any questions or require any additional information, please do not hesitate to contact me.

Yours truly,

Antonio C. Martinez, II. Esq.

cc: Dr. Doug Metz, ASHW





October 30, 1998

Office of Special Nutritionals HFS-450 Center for Food Safety and Applied Nutrition U.S. Food and Drug Administration 200 C St.SW Washington DC 20204

Statement of Nutritional Support- DAILY MULTIPLE VITAMIN + MINERAL

Pursuant to 21 CFR Part 101.93, American Specialty Health & Wellness (ASHW) files the following Statement of Nutritional Support for the Dietary Supplement marketed as: DAILY MULTIPLE VITAMIN + MINERAL

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr. Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made:
 "Daily Vitamin + Multiple Mineral is a combination of vitamins
 and minerals formulated to provide additional nutrient
 supplementation to the daily diet. A complete, balanced
 assortment of essential minerals and other nutrients is necessary
 for healing, growth, tissue vitality and resistance to illness."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: DAILY MULTIPLE VITAMIN + MINERAL
- 5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. Doug Metz, Vice President.

Yours truly

Dr. Doug Metz Vice President

62292

Daily Multiple Vitamin + Minerals

Description:

Daily Multiple Vitamin + Mineral is a combination of vitamins and minerals formulated to provide additional nutrient supplementation to the daily diet. A complete, balanced assortment of essential vitamins, minerals and other nutrients is necessary for healing, growth, tissue vitality and resistance to illness.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

Manganese (as amino chelate)	2mg	100%
Chromium (as nicotinate glycinate)	100mcg	13%
PABA	25mg	•

Other Ingredients: Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide. "Daily Yalue not established

Daily Multi-Vitamin + Minerals is free of wheat, corn, dairy, sucrose, starch, salt and yeast.

Directions for Use: Take I capsule 3 times per day

Storage: Keep lightly closed in a cool, dry place.

Caution/Warning: As with any supplement, herb or medication do not use it while pregnant or factating, or provide it to a child without consulting a physician.

Note: This product is regulated by the FDA as a dietary supplement. If you have any questions about how you teel white taking this supplement, contact your physician. If you are taking any medication, have any disease or illness, consult your physician before taking this product. Do not stop or change prescribed medication without the permission or prescription of your physician.

DISTRIBUTED BY AND RICAN SPECIAL TY HEALTH & WELFING SS (M. PO BOX 509040) SAN DRECO, CA 97 (50-9040)

DAILY MULTI-VITAMIN + MINERALS

DIETARY SUPPLEMENT

90 CAPSULES

Premium Products for Your Health & Wellness'

Vitamin C (as ascobic acid) 200mg 333** Calcium (as citrate malate) 200mg 20** Vitamin D 700 it 0 50** Vitamin G (as d-alpha locopherol acetate) 100 it 0 30** Vitamin E (as d-alpha locopherol acetate) 100 it 0 313** Niamin (as shitamin mononitrate) 7 5mg 500** Ribollavin 8 5mg 500** Ribollavin 8 5mg 125** Vitamin BS (as priridume IICt) 10mg 500** Folate (as lotic acid) 400mcg 100** Vitamin BI 100mcg 1667** Vitamin BI 100mcg 1667** Vitamin BI 250** Vitamin BI 100mcg 150** Vitamin Bi 100** Vitamin Bi	Serving Size: 3 Capsules - Servings Per Container. 30		
and palmitale, 4000 IU 12,000 IU 2407 Vilamin C (as ascobic acid) 200mg 1335 Calcium (as citrate malate) 200mg 2007 Vilamin D 700 IU 507 Vilamin C (as d-alpha locopherol acelate) 100 IU 3337 Ihiamin (as thiamin mononitrate) 7 5mg 500 Ribotlavin 8 5mg 500 Ribotlavin 8 5mg 500 River (as macinamide) 25mg 125 Vilamin B6 (as pyridonine IICI) 10mg 500 Folate (as folic acid) 400mcg 100 Vilamin B12 100mcg 1667 Biotin 400mcg 133 Paniothenic acid 25mg 2506 Magnesium (as amino chelate) 50mg 125 Tinc (as amino chelate, builered) 15mg 100 Selenium (as amino complex) 100mcg 14		mount for Leaning	LBaily Takes
and palmitale, 4000 IU 12,000 IU 2407 Vilamin C (as ascobic acid) 200mg 1335 Calcium (as citrate malate) 200mg 2007 Vilamin D 700 IU 507 Vilamin C (as d-alpha locopherol acelate) 100 IU 3337 Ihiamin (as thiamin mononitrate) 7 5mg 500 Ribotlavin 8 5mg 500 Ribotlavin 8 5mg 500 River (as macinamide) 25mg 125 Vilamin B6 (as pyridonine IICI) 10mg 500 Folate (as folic acid) 400mcg 100 Vilamin B12 100mcg 1667 Biotin 400mcg 133 Paniothenic acid 25mg 2506 Magnesium (as amino chelate) 50mg 125 Tinc (as amino chelate, builered) 15mg 100 Selenium (as amino complex) 100mcg 14	Vitamin A (as beta-carolene, 8000) IU	
Vilamin C (as ascorbic acid) 200mg 133** Calcium (as citrale malate) 200mg 20** Vilamin D 200 NU 50** Vitamin C (as d-alpha (ocopherol acetate) 100 NU 313** Ihamin (as hiamin mononitrate) 3 Smg 500** Ribollavin 8 Smg 500** Niacin (as macmamide) 25mg 125** Vilamin B6 (as pridomine HCt) 10mg 500** Olate (as Jolic acid) 400mcg 100** Vilamin B12 100mcg 166** Biotin 400mcg 15** Paniothenic acid 25mg 250** Magnesium (as amino chelate) 50mg 125** Zinc (as amino chelate, builered) 15mg 100** Selenium (as amino complex) 100mcg 14**			240%
Calcium (as citrate malate) 200mg 20' 71amin (100 it) 50' 100 it) 50'		200mg	133%
Vitamin D 200 iu 50° Vitamin C 30 alpha (ocopherol acetate) 100 iu 111 Ihiamin (as thiamin mononitrate) 7 Smg 500 Riadin (as macinamide) 2 Smg 500 Riadin (as macinamide) 7 Smg 125 Vitamin B6 (as praiduine IICI) 10mg 500 folate (as folic acid) 400mct 100 Vitamin B12 100mcg 1637 Biotin 400mct 133 Paritotlenic acid 25mg 250 Magnesium (as amino chetate) 50mg 12 S Zinc (as amino chetate) 15mg 100 Selenium (as amino complex) 100mcg 14		200mg	20%
Vitamin E (as d'alpha locopherol acetate) 100 iU 3.33* Ihiamin (as thiamin mononitrate) 7 Sing 500* Ribollavin 8 Sing 500 Niacin (as macinamide) 7 Sing 125 Vitamin 86 (as ppidozine IICI) 10mg 500 folate (as folic acid) 400mcg 100 Vitamin 812 100 mcg 1667 Biotin 400mcg 133 Pariothenic acid 25 mg 25 mg Magnesium (as amino chetate) 50mg 125 Zinc (as amino chetate, builtered) 15 mg 100 Selenium (as amino complex) 100mcg 14	Yitamin D		50%
Iniamin (as Ihiamin mononitrate) 7 Sing 500 Ribollavin 8 Sing 500 Ribollavin 2 Sing 125 Ribollavin 3 Sing 125 Ribollavin	Vitamin E (as d-alpha locopherol	acetate) 100 IU)))%
Ribollavin B 5mg 500 Nacin (las macinamide) 75mg 125 74amin B6 (as pridaine IICI) 10mg 500 500 10mg 500 10mg 10mg			500%
Niacin (as macinamide) 75mt 125 742min 86 (as pridurine HCI) 10mg 500 10ale (as folic acid) 400mct 100 10ale (as folic acid) 400mct 150 1657 16iotin 400mct 153 16iotin 400mct 153 250 16iotin 25mg 250 16iotin 25mg 125 16iotin 25mg 100 16iotin 25mg 25			500%
Vilamin 86 (as pyriduine IICt) 10mg 500 Folale (as Jolic acid) 400mcg 100 Vilamin B12 100mcg 165 Biotin 400mcg 133 Pantothenic acid 25mg 25G Magnesium (as amino chelate) 50mg 125 Zinc (as amino chelate, butlered) 15mg 100 Selenium (as amino complex) 100mcg 14		25mt	125%
Folate (as folic acid) 400mct 100		10mg	500%
Vilamin B12 100mcg 1667 Brotin 400mcg 133 Pariothenic acid 25mg 250 Magnesium (as amino chelate) 50mg 125 Zinc (as amino chelate, bullered) 15mg 100 Selenium (as amino complex) 100mcg 14		400mcg	100%
Riotin 400mcg 133 Pantothenic acid 25mg 250 Magnesium (as amino chelate) 50mg 12.5 Linc (as amino chelate, butlered) 15mg 100 Selenium (as amino complex) 100mcg 14		100mcg	1661%
Paniothenic acid 25mg 250 Magnesium (as amino chelate) 50mg 12.5 Zinc (as amino chelate, bullered) 15mg 100 Selenium (as amino complex) 100mcg 14	the same property of the same property of the same same same same same same same sam	400mcg	11112
Magnesium (as amino chefate) 50mg 12.5 Zinc (as amino chefate, buffered) 15mg 100 Selenium (as amino complex) 100mcg 14.1		25mg	250%
Zinc (as amino chelate, butlered) 15mg 100 Selenium (as amino complex) 100mcg 141		Some	125%
Selenium (as amino complex) 100mcg 143) 15mg	100%
			143%
	Copper (as amino chelate)	2 m g	100%

Supplement Facts



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October 30, 1998

Office of Special Nutritionals HFS-450 Center for Food Safety and Applied Nutrition U.S. Food and Drug Administration 200 C St.SW Washington DC 20204

Statement of Nutritional Support- DAILY MULTI-MINERAL Pursuant to 21 CFR Part 101.93, American Specialty Health & Wellness (ASHW) files the following Statement of Nutritional Support for the Dietary Supplement marketed as: DAILY MULTI-MINERAL

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr. Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made: "Daily Multiple Mineral is a unique combination of mineral nutrients formulated to provide additional nutrient supplementation to the daily diet. A complete, balanced assortment of essential minerals and other nutrients is necessary for healing, growth, tissue vitality and resistance to illness."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: DAILY MULTI-MINERAL
- 5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. Doug Metz, Vice President.

Yours truly,

Dr. Doug Metz Vice President

62292

Daily Multiple Mineral

Description:

Daily Multiple Mineral is a unique combination of mineral nutrients formulated to provide additional nutrient supplementation to the daily diet. A complete, balanced assortment of essential minerals and other nutrients is necessary for healing, growth, tissue vitality and resistance to illness.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

Directions For Use: Take 1 tablet 1 times per day.

Storage: Keep tightly closed in a coof, dry place.

Caution/Warraing: As with any supplement, herb or medication,
do not use it while pregnant or lactating, or provide it to a child
without consulting a physician.

Mote: This product is regulated by the FOA as a dietary supplement. If you have any questions about how you leef while taking this supplement, contact your physician. If you are taking any medication, have any disease or illness, consult your physician before taking this product. On not stop or change prescribed medication without the permission or prescription of your physician.

Chelavite" and Chelazome" are registered trademarks of Albion Laboratories, Inc.

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DIETARY SUPPLEMENT

90 TABLETS

Premium Products for Your Health & Wellness'

Supplement Facts

Serving Size: 3 Tablets - Servings Per Container: 30

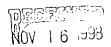
	mount for Serving	ZOAILT Yelve
Potassium (as amino complex)	99mg	3%
Calcium (as amino chelate)	250mg	25%
Magnesium (as amino chelate, bu	Hered) 100mg	25%
Zinc (as zinc Chelazome® amino i	chelate) 15mg	100%
Selenium (as amino complex)	100mcg	143%
Copper (as amino chelate)	2mg	100%
Manganese (as amino chelate)	3mg	150%
Chromium (as chronium Chelavite	(3)	
amino chelate)	200mcg	166%
Molybdenum (as amino chelate)	50mc g	67%
Boron (as amino chelate)	500mcg	•

Other Ingredients: Gelatin, Cellulose, calcium phosphate hydrous, steatic acid, magnesium steatate and silicon dioxide

*Daily Value not established

Daily Multi-Mineral is free of wheat, corn, soy, dairy sucrose, starch, salt and yeast





October 30, 1998

Office of Special Nutritionals
HFS-450 Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C St.SW
Washington DC 20204

Statement of Nutritional Support- VITAMIN C ESTER-C
Pursuant to 21 CFR Part 101.93, American Specialty Health &
Wellness (ASHW) files the following Statement of Nutritional
Support for the Dietary Supplement marketed as: VITAMIN C ESTER-C

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr. Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made: "Vitamin C, also known as ascorbic acid, is an antioxidant that is required for proper tissue growth and maintenance and adrenal gland function. Ester C has naturally bonded minerals that help the body absorb the Vitamin C more quickly. Vitamin C supports a healthy immune system, protects against bruising, and assists in blood clotting, tissue formation and the healing of wounds. Chewable C should be taken with food and chewed well, for best absorption."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: VITAMIN C ESTER-C
- 5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. Doug Metz, Vice President.

Yours truly,

Dr. Doug Metz Vice President

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8989 Rio San Diego Dr., Suite 250, San Diego, CA 92108 • Phone 619/297-8100 • Fax 619/209-6236 6 27 97

Ester Vitamin C

(Ascorbic Acid, Polyascorbate)

Description:

Vitamin C, also known as ascorbic acid, is an antioxidant that is required for proper tissue growth and maintenance and adrenal gland function. Ester C has naturally bonded minerals that help the body absorb the vitamin C more quickly. Vitamin C supports a healthy immune system, protects against bruising, and assists in blood clotting, tissue formation and the healing of wounds.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

Directions For Use: Take 1 tablet per day Storage: Keep tightly closed in a cool, dry place.

Caution/Warning: As with any supplement, herb or medication, do not use it while pregnant or lactating provide it to a child without consulting a physician. Mega-doses can cause diarrhea and skin rashes, and long term mega-doses can cause oralate and uric acid stone formation.

Note: This product is regulated by the FDA as a dietary supplement. If you have any questions about how you feet while taking this supplement, contact your physician. If you are talking any medication, have any disease or illness, consult your physician before taking this product. Do not stop or change prescribed medication without the permission or prescription of your physician.

DISTRIBUTED BY AMERICAN SPECIAL IT HEALTH & WELLINGSS !!!
FO BOX 505010, SAN DILCO, CA 92150 9040



100 TABLETS

Premium Products for Your Health & Wellness'

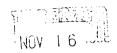
Supplement Facts
Serving Size: 1 Tablet - Servings Per Container 100

Vitamin C (as Ester-C® calcium) 500mg 833%
Citrus bioliavonoids
(citrus rind, std 35% bioliavonoids) 200mg
Other Ingredients: Gelalin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon discarde Daily Yalue not established

Vitamin C Ester-C is free of wheat, coin dairy, sucrose states, salt and yeast

Rand Ester-C1M are licensed trademarks of Inter Cal Coop Manufactured under U.S. Patent No. 4,822,816. Other loreign patents pending





October 30, 1998

Office of Special Nutritionals
HFS-450 Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C St.SW
Washington DC 20204

Statement of Nutritional Support- VITAMIN C COMPLEX
Pursuant to 21 CFR Part 101.93, American Specialty Health &
Wellness (ASHW) files the following Statement of Nutritional
Support for the Dietary Supplement marketed as: VITAMIN C COMPLEX

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr. Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made: "Vitamin C, also known as ascorbic acid, is an antioxidant that is required for proper tissue growth and maintenance and adrenal gland function. Vitamin C supports a healthy immune system, protects against bruising, and assists in blood clotting, tissue formation and the healing of wounds. Chewable C should be taken with food and chewed well, for best absorption."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: VITAMIN C COMPLEX
- 5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. Doug Metz, Vice President.

Yours truly,

Dr. Doug Metz

Vice President

rwhut

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Vitamin C Complex

Description:

Vitamin C, also known as ascorbic acid, is an antioxidant that is required for proper tissue growth and maintenance and adrenal gland function. Vitamin C supports a healthy immune system, protects against bruising, assists in blood clotting, tissue formation and the healing of wounds. Vitamin C Complex contains ascorbic acid, four forms of ascorbate and citrus bioflavonoids.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

Directions For Use: Take 1 tablet per day.

Storage: Keep tightly closed in a cool, dry place.

Caution/Warning: As with any supplement, herb or medication, do not use it while pregnant or tactating, or provide it to a child without consulting a physician.

Note: This product is regulated by the FDA as a dietary supplement. If you have any questions about how you teel while taking this supplement, contact your physician. If you are taking any medication, have any disease or illness, consult your physician before taking this product. Do not stop or change prescribed medication without the permission or prescription of your physician.

DISTRIBUTED BY AMERICAN SPECIALTY HEALTH & WELLMESS ***
PO BOX 509040, SAN DECO, CA 92150-9040



Supplement facts

Serving Size: 1 Tablet - Servings Per Container, 100

Amount Per Serving. % Baily Talve

Vilamin C (as ascorbic acid, calcium ascorbate, magnesium ascorbate,

potassium ascorbate, sodium ascorbate) 500mg

Citrus bioflavonoids (citrus rind, std. 35% bioflavonoids)

100mg

Other Ingredients: Gelatin, cellulose, calcium phosphale hydrous, stearic acid, magnesium stearate and silicon dioxide

*Daily Value not established

Vitamin-C Complex is liee of wheat, coin, dairy, sucrose, starch salt and yeast

100 TABLETS

Premium Products for Your Health & Wellness'



NOV 16 1345

October 30, 1998

Office of Special Nutritionals HFS-450 Center for Food Safety and Applied Nutrition U.S. Food and Drug Administration 200 C St.SW Washington DC 20204

Statement of Nutritional Support- VITAMIN E PLUS
Pursuant to 21 CFR Part 101.93, American Specialty Health &
Wellness (ASHW) files the following Statement of Nutritional
Support for the Dietary Supplement marketed as: VITAMIN E PLUS

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr. Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made:
 "Vitamin E is a fat soluble vitamin that is a powerful
 antioxidant. Antioxidants protect tissue cells from damage caused
 by toxic chemicals, radiation and overexposure to the sun.
 Vitamin E is important in the body's cardiovascular, immne, and
 endocrine system and the healing of wounds. Vitamin E works
 closely with zinc and other antioxidants to strengthen many
 functions of the body, including immunity."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: VITAMIN E PLUS
- 5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. Doug Metz, Vice President.

Yours truly,

Dr. Doug Metz Vice President

62292-

Vitamin E Plus

Description: Vitamin E is a fat-soluble vitamin that is a powerful antioxidant. Antioxidants protect tissue cells from damage caused by toxic chemicals, radiation and overexposure to the sun. Vitamin E is important in the body's cardiovascular, immune, and endocrine system and the healing of wounds. Vitamin E works closely with zinc and other antioxidants to strengthen many functions of the body, including immunity. Vitamin E Plus also contains the mineral selenium.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

Directions for Use: Take I capsule per day. Storage: Keep lightly closed in a cool, dry place. Caution/Warning: As with any supplement, herb or medication, do not use it while pregnant or tactating, or provide it to a child without consulting a physician. Mega-dose inlake of Vitamin E is reported to induce plurred vision and headache.

Note: This product is regulated by the FDA as a dietary supplement. If you have any questions about how you leet while taking this supplement, contact your physician, If you are taking any medication, have any disease or iffness, consult your physician before taking this product. Do not stop or change prescribed medication without the permission or prescription of your physician.

DISTRIBUTED BY AMERICAN SYTCIAL IT HEALTH & MILLING SS THE PO BOX 507048, SUI DIEGO, CA 92150 9040



Serving Size: 1 Capsule - Servings Per Container: 90

Amount Per Sernne: 3. Fally Tains

Yilamin E (as d-alpha

tocophero succinate) Selenium (L-selenomethionine)

100 NJ 1333% 140mcg

Other Ingredients: Gelatin, cellulose, calcium phosphale hydrous, stearic acid, magnesium stearate and silicon dioxide. Yilamin E Plus is free of wheat, coin, dairy, sucrose, starch, sall

90 CAPSULES

Premium Products for Your Health & Wellness'



NOV 16 III

October 30, 1998

Office of Special Nutritionals
HFS-450 Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C St.SW
Washington DC 20204

Statement of Nutritional Support- ASTRAGULUS EXTRACT
Pursuant to 21 CFR Part 101.93, American Specialty Health &
Wellness (ASHW) files the following Statement of Nutritional
Support for the Dietary Supplement marketed as:
ASTRAGULUS EXTRACT

- 1) Name and Address of Distributor: ASHW 8989 Rio San Diego Dr. Ste. 250, San Diego CA 92108
- 2) Text of Nutritional Support Statement being Made:
 "Astragulus, also known as milk-vetech root is considered a
 general tonic. The root of the plant is used to support a
 healthy immune system, promote healing, and counteract fatigue.
 General tonics such as astragulus are believed to enhance the
 body' ability to cope and adapt to stressful conditions."
- 3) Name of dietary ingredient(s): See Attached Product Label
- 4) Brand Name: ASTRAGULUS EXTRACT
- 5) Substantiation information on file at the company office. The corporate officer who can certify same is Dr. Doug Metz, Vice President.

Yours truly,

Dr. Doug Metz Vice President

62292

Astragalus Extract

Description:

Astragalus, also known as milk-vetch root, is considered a general tonic. The root of the plant is used to support a healthy immune system, promote healing and counteract fatigue. General tonics such as astragalus are believed to enhance the body's ability to cope and adapt to stressful conditions.

These statements have not been evaluated by the Food and Drug Administration (FDA). This product is not intended to diagnose, treat, cure or prevent any disease.

Directions For Use: Take I capsule per day.

Storage: Keep tightly closed in a cool, dry place.

Caution/Warning: As with any supplement, herb or medication, do not use it while pregnant or lactating, or provide it to a child without consulting a physician.

Note: This product is regulated by the FDA as a dietary supplement. If you have any questions about how you feel while taking this supplement, confact your physician. If you are taking any medication, have any disease or illness, consult your physician before taking this product. Do not slop or change prescribed medication without the permission or prescription of your physician.

DISTRIBUTED BY AMERICAN SPECIALTY HEALTH & WELCHESS M. PO BOX 509010, SAN DEGO, CA 92150-9010



Supplement Facts

Serving Size: 1 Capsule - Servings Per Container. 30

Amount Per Serving: % Daily Yalue

Astragalus extract (Astragalus membranaceusroot, std 16% astragalosides)

450mg

Other Ingredients: Gelatin, cellulose, calcium phosphate hydrous, stearic acid, magnesium stearate and silicon dioxide.

*Daily Value not established

Astragalus Extract is free of wheat, corn, suy, dairy, sucrose, starch, salt and yeast.

30 CAPSULES

Premium Products for Your Health & Wellness™